

OSCAR MADRIGAL SENCION, an
individual,

Plaintiff,

Hon: Jeremy Fogel

**STIPULATION AND ~~{PROPOSED}~~
ORDER CONTINUING DEADLINE TO
COMPLETE SETTLEMENT
CONFERENCE**

SAXON MORTGAGE SERVICES, INC.; a business of unknown form; OCWEN LOAN SERVICING, LLC, a business of unknown form; DEUTSCHE BANK NATIONAL TRUST COMPANY, a business of unknown form, and DOES 1 through 100, inclusive,

Defendants.

1 The parties hereby stipulate as follows and respectfully request that the Court enter the
2 proposed order set forth below.

3 WHEREAS on March 18, 2011 the parties, Plaintiff Oscar Madrigal Sencion ("Plaintiff"),
4 Defendant Saxon Mortgage Services, Inc., ("Saxon") and Defendant Ocwen Loan Servicing, LLC
5 ("Ocwen"), stipulated to continue the deadline to complete settlement conference ,to May 31,
6 2011 which stipulation was approved by the Court; and

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8 WHEREAS in so stipulating to the continuance to May 31, 2011 the Plaintiff indicated he
9 intended to submit financial and other documents to Ocwen sufficiently in advance of the May
10 31, 2011 deadline (30-45 days) for Ocwen to complete its review for a loan
11 modification/reinstatement. The parties indicated in the stipulation that a settlement conference
12 would be unlikely to result in a settlement unless this occurred; and

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14 WHEREAS, Plaintiff has failed to submit any documents to Ocwen for its review for a
15 loan modification, necessitating another continuance of the deadline to complete settlement
16 conference; and

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18 WHEREAS, the parties have agreed to conduct the settlement conference on July 19,
19 2011, at 10:00 a.m., or the soonest time and date thereafter upon which Magistrate Judge Lloyd is
20 able to conduct the conference. .

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22 WHEREAS, Plaintiff has agreed to forward all necessary financial documentation to
23 counsel for Ocwen not later than May 15, 2011; so that Ocwen has sufficient time to complete its
24 review for a loan modification/reinstatement prior to the settlement conference date.

25 NOW, THEREFORE, the Parties stipulate and agree as follows:

26 1. The deadline to complete the settlement conference shall be continued from May
27 31, 2011 to August 15, 2011. The settlement conference will be held on July 19, 2011, at 10:00
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1 a.m., or the soonest time and date thereafter upon which Magistrate Judge Lloyd is able to
2 conduct the conference. Plaintiff will provide all requested financial documentation to counsel for
3 Ocwen not later than May 15, 2011.

4 IT IS SO STIPULATED.

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6 Dated: May 9, 2011

CENTURY LAW GROUP, LLP

8 /s/ Rizza Gonzales

9 Edward O. Lear

Rizza Gonzales

10 Attorneys for Plaintiff

11 Oscar Madrigal Sencion

12
13 Dated: May 9, 2011

WOLFE & WYMAN, LLP

14 /s/ Marcus T. Brown

15 Marcus T. Brown

16 Attorneys for Defendant

17 Saxon Mortgage Services, Inc. and

Deutsche Bank National Trust

18 Company, Trustee and Custodian

19 Natixis Real Estate Capital Trust

20 2007-HE Mortgage Pass-Through

Certificates, Series 2007-HE2

21 Dated: May 9, 2011

HOUSER & ALLISON, APC

22 /s/ Brian Edwards

23 Eric D. Houser

24 Brian S. Edwards

25 Attorneys for Defendant

26 Ocwen Loan Servicing, LLC

1 ~~PROPOSED~~ ORDER

2 Based upon the foregoing stipulation and good cause appearing, the Court ORDERS that
3 the deadline for the parties to complete a settlement conference with Magistrate Judge Lloyd is
4 hereby CONTINUED to and including August 15, 2011.
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6 IT IS SO ORDERED.
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8 Dated: 5/11/11



9 Hon. Jeremy Fogel
10 United States District Court Judge
11 United States District Court, Northern District of
12 California
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